

(Del. Rev. 5/14) Pro Se Prisoner Civil Rights Complaint

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

De-Shawn Drumbo SR #365566
1181 Paddock road
SMYRNA, Delaware 19777
(In the space above enter the full name(s) of the plaintiff(s).)

-against-

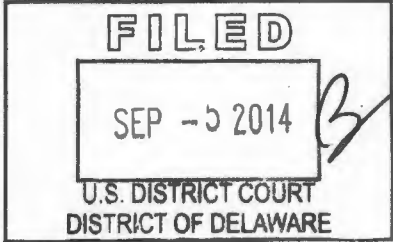
SGT William Kuschel
C.O. VAN Gorder
Lieutenant WALLACE

(In the space above enter the full name(s) of the defendant(s).
If you cannot fit the names of all of the defendants in the
space provided, please write "see attached" in the space
above and attach an additional sheet of paper with the full list
of names. The names listed in the above caption must be
identical to those contained in Section IV. Do not include
addresses here.)

Civ. Action No. _____
(To be assigned by Clerk's
Office)

COMPLAINT
(Pro Se Prisoner)

Jury Demand?
☐ Yes
☐ No



NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Do not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

(Del. Rev. 5/14) Pro Se Prisoner Civil Rights Complaint

I. COMPLAINT

Indicate below the federal legal basis for your claim, if known. This form is designed primarily for pro se prisoners challenging the constitutionality of their conditions of confinement, claims which are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

Check one:

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

II. PLAINTIFF INFORMATION

Drumbo De-Shawn D		"Drumbo"
Name (Last, First, MI)		Aliases
#365566b		
Prisoner ID #		
J.T.U.C.C.		
Place of Detention		
1181 Paddock Road		
Institutional Address		
Smyrna	DE	19977
County, City	State	Zip Code

III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

The following officers are working at J.T.V.CC.

Stanley Butnard works as internal Affairs officer at J.T.V.CC.

SGT Austin works as SGT at J.T.V.CC.

C.O. Ingrem works as C.O. at J.T.V.CC.

C.O. Levin works as CO. at J.T.V.CC.

C.O. Abernathy works as A CO at J.T.V.CC.

C.O. Hutchins works as A CO at J.T.V.CC.

Warden Pierce Warden At J.T.V.CC

Captain Burton Captain At J.T.V.CC

Commissioner Coule Commission of J.T.V.CC.

C.O. Patson's C.O. At J.T.V.CC.

J.T.V.CC

The Address for All is 1181 Paddock Road
SMYRNA, DE 19977

(Del. Rev. 5/14) Pro Se Prisoner Civil Rights Complaint

V. STATEMENT OF CLAIM

Place(s) of occurrence: #23 Building Chow Hall

Date(s) of occurrence: MAY 29th 2014

State which of your federal constitutional or federal statutory rights have been violated:
1st, 8th & 14th Amendment's

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions, state whether you were physically injured as a result of those actions, and if so, state your injury and what medical attention was provided to you.

FACTS:
Please see the 19x7 3 Pages
of Detailed Sexual Assault

What happened to you?

1st, 8th And 14th Amendment violation sexual Assault & retaliation
for filing Grievances, Complaint's & civil suit's

I De-Shawn Drumgo SR SR#365566 swear under the Penalty of federal Perjury the foregoing is true:

On the Date of MAY 29th, 2014. I was walking out of the Chowhall from dinner when I walked to C.O. VAN Gorder who pointed me to Sgt William Kuschel whom I noticed had on leather black gloves instead of the latex gloves usually used for "Pat-N-Frisk" searches leaving the Chow-Hall.

Sgt Kuschel told me Plaintiff Drumgo to raise my Arms & keep them stretched even if I felt his hands in my ass." He told me not to say Anything cause no one was going to help me." Sgt Kuschel conducted the Pat-N-frisk in An inappropriate manner that included repeatedly & slowly in Attempts to seduce me Sgt Kuschel groped my leg's three different times until he reached my penis."

I the Plaintiff Drumgo said I will let one of Your other officer's strip search me versus Your sexual assaulting me Sgt Kuschel went on up my penis stroking it, Jacking it & Yanking it in A masturbative or what he thought to be A seductive manner

I Plaintiff Drumgo jumped saying this is the 2nd time You have sexually assaulted me. (Please see Previous Grievance referred to I.A) Sgt Kuschel was still gripping my penis Now he was squeezing my Penis intentionally maliciously & sadistically for the Purpose of causing harm where I could now feel the cracking & burning of my skin, off the skin of MY Penis. (Please see sick-call exhibit)

I the Plaintiff Drumgo shouted let go of MY Dick!

this was objectively & sufficiently serious, an unnecessary infliction of pain inflicted by Sgt Kuschel this served no legitimate Penological Purpose." the following officer's did nothing but laughter I was humiliated, embarrassed & violated Publicly.
officer's Van Gorder, Hutchins, Ingram, Abernathy done nothing but laugh.

After all of that there was no food nor contraband recovered.
I filed A sick-call for the injury to my Penis Sgt Kuschel ruptured the skin on my Penis. (Please see sick as exhibit).

I've filed Grievances this time and previously when this man caressed my nipples & Buttocks Please (see Grievance in discovery)

I Also filed A sick-call to mental health About the nightmares I had night's in A Row Afterwards causing me not being able to sleep for having sick visions of being tied down and dominated by C.O.'s Correctional officer's. This has caused me Psychological harm this is the second time something like this has happened at the hands of SGT William Kuschel.

I again filed a grievance for this repetitive sexual Abuse.

Afterwards I spoke to C.O. Van Gorder who told me she is Aware of Sgt Kuschel's M/O (motive) And that All staff is Aware of his illicit sexual searches. I spoke with C.O. Ingram who said that Lieutenant Wallace & Lieutenant have warned Sgt Kuschel About his conduct being inappropriate but he goes right back to grabbing dick's.

I talked to C.O. Levin who spoke of Sgt Kuschel's conduct as a "illicit sexual searches" than when C.O. Levin realized he was talking to A convict he tried to justify the means then he went into saying he doesn't trust ANY C.O.'s. (Correctional officer's)

I talked to C.O. Hutchins who said Under no circumstance will I do what he does grabbing nor groping men's dick's I have one of my own.

I Also Approached Lieutenant Wallace to let him know in front of Sgt William Kuschel that I was sexually assaulted L.T. Wallace made it known he supported his officer's illegal searches However I no longer seen Sgt Kuschel when leaving the Chow-Hall.

All these officer's were Aware of Sgt Kuschel's sexually Assaulting inmates however they All failed to intercede or help me they just found it funny and laughed totally neglecting their duty to speak-up & or write-up inappropriate conduct instead they conspired in sexual assault's on numerous occasions.

This is Equivalent to one in Delaware Putting one tip of A finger into A Vagina not only does the Perpetrator become A Rapist & suspect but so does the People who watched & failed to call the Police.

I was interviewed by A now internal affairs officer formally a Lieutenant Stanley Batward who was A named defendant in A previous civil suit currently Pending. (Conflict of interest & biased) officer Batward did not document his Questioning & when I asked him about why he took the position he spoke of the convenience of the hours, Not because it was the right thing to do.

This officer had me transferred to bldg #21 which is known to the convicts As the Hell-Hole; This was the second time I was transferred for filing a Grievance Against Kuschel for his Conduct & sexual assault.

On the Arrival to #21-C-L-4 there was no electric my cell-mate Howard Blanchfield said that he hasn't had electric since he been in this cell. I asked Sgt Austin could he please turn on the electric he said hell no! Oh what you think there isn't ANY retribution for filing Complaints About sexual assault. You continue on with your Grievances we Always win.

This building is called the Hell-Hole because you receive & I receive half portions of food versus what the rest of the prisoners get in the rest of the building's NO contact visit's, recreation twice A week, less phone calls no electric, Poor Counselor's, combined with being taunted by numerous officer's About sexual assault ridiculing J.T.U.C.C. Prisoner Rule Program on Channell 19

I have A right to be free from a cruel & unusual Punishment free from retaliation for filing Grievances, Complaint's & Civil Suits.

I De-Shawn Drumbo sr hereby verify that all facts & events averred in this Complaint are true & accurate to the best of my knowledge

Affiant D. Drumbo sr

D. Drumbo sr
De-Shawn Drumbo sr
1181 Paddock rd
SMYRNA, GA 30087

(Del. Rev. 5/14) Pro Se Prisoner Civil Rights Complaint

VI. ADMINISTRATIVE PROCEDURES

WARNING: Prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions. 42 U.S.C. § 1997e(a). Your case may be dismissed if you have not exhausted your administrative remedies.

Is there a grievance procedure available at your institution?

☒ Yes☐ No

Have you filed a grievance concerning the facts relating to this complaint?

☒ Yes☐ No

If no, explain why not:

Is the grievance process completed?

☒ Yes☐ No

If no, explain why not:

VII. RELIEF

State briefly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

- 1) seeking to sue each officer in their individual capacity
And official capacity for 1,000,000 each
- 2) I request the Plaintiff seek's A injunction & TRO for
A Transfer to Another facility
- 3) Seeking Punitive & Compensatory damages

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VIII. PRISONER'S LITIGATION HISTORY

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if that prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. §1915(g).

Have you brought any other lawsuits in state or federal court while a prisoner? ☒ Yes ☐ No

If yes, how many? 3

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)

A. 1:08-CV-00592 Jbs / 3rd Cir. Court of Appeals
reversed, remanded Delaware's decision Vacated
W. 12-1243
C) 1:12-CV-00068 GMS Judge Guy Sleet

(Del. Rev. 5/14) Pro Se Prisoner Civil Rights Complaint

IX. PLAINTIFF'S DECLARATION AND WARNING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Plaintiff must sign and date the complaint and provide prison identification number and prison address.

7-27-14

Dated

D. D. Drumbo sr

Plaintiff's Signature

De-Shawn N Drumbo sr

Printed Name (Last, First, MI)

#365566

Prison Identification #

1181 Paddock rd SMYRNA DE 19977

Prison Address

City

State

Zip Code

Do not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

(Rev. 5/05)

**FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

(1) De-Shawn Drumgo sr #365566
(Name of Plaintiff) (Inmate Number)

1181 Paddock Road, Smyrna, DE 19977
(Complete Address with zip code)

(2) _____
(Name of Plaintiff) (Inmate Number)

(Complete Address with zip code)

(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

vs.

(1) SGT William Kuschel
(2) C.O. Van Gorder
(3) Lieutenant Wallace
(Names of Defendants)

(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

A) 1:08-cv-00592 Jbs / 3rd Cir Court of Appeal reverse, remanded
Delaware's decision vacated
b) 12-1243
c) 1:12-cv-00068 GMS Judge steet

14 - 1135

(Case Number)

(to be assigned by U.S. District Court)

CIVIL COMPLAINT

• • Jury Trial Requested

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ☒ Yes • • No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☒ Yes • • No

C. If your answer to "B" is Yes:

1. What steps did you take? Wrote Grievance, interviewed by internal affairs
called "Prea" Prisoner Rape
2. What was the result? retaliation being sent to A building #21
called the hell-hole no electric, no Air condition, no hot water
Poor Counselor.

D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS (in order listed on the caption)

(1) Name of first defendant: SGT William Kuschel

Employed as SGT at J.T.V.CC

Mailing address with zip code: 1181 Paddock Road
SMYRNA, Delaware 19977

(2) Name of second defendant: C.O. Van Gorder

Employed as C.O. at J.T.V.CC

Mailing address with zip code: 1181 Paddock Road
SMYRNA, Delaware 19977

(3) Name of third defendant: Lieutenant Wallace

Employed as Lieutenant at J.T.V.CC

Mailing address with zip code: 1181 Paddock Road
SMYRNA, Delaware 19977

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. SGT William Kuschel sexually assaulted me and has assaulted others this man grabbed my penis in attempts to rip it off after he tried to seduce me and I rejected his advances Please Complaint Next Page
2. C.O. Van Gorder failed to stop the assault she also failed to write-up such conduct that happened daily which could have prevented the assault of Drumbo
3. Lieutenant Wallace failed to intercede write-up, report incident and said he agreed with such conduct

V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. seeking to sue each officer in their individual capacity and official capacity for 1,000,000 each
2. Drumbo the Plaintiff seeks a injunction TRO for a transfer to another facility
3. seeking punitive & compensatory damages

The following officers are working at J.T.V.CC.

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Warden Pierce Warden At J.T.V.CC

Captain Burton Captain At J.T.V.CC

The Address for All is J.T.V.CC
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I De-Shawn Drumgo SR SR# 365566 swear under the Penalty of Federal Perjury the foregoing is true:

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On the arrival to #21-C-L-4 there was no electric in my cell-mate Howard Blanchfield said that he hasn't had electric since he been in this cell. I asked Sgt Austin could he please turn on the electric he said hell no! Oh what you think there isn't any retribution for filing complaints about sexual assault. You continue on with your grievances we always win.

This building is called the Hell-hole because you receive & I receive half portions of food versus what the rest of the prisoners get in the rest of the building's no contact visit's, recreation twice a week, less phone calls no electric, poor counselor's, combined with being taunted by numerous officer's about sexual assault ridiculing J.T.U.C.C. Prisoner Rule Program on Channell 19

I have A right to be free from a cruel & unusual punishment free from retaliation for filing grievances, complaints & civil suits.

I De-Shawn Drumbo sr hereby verify that all facts & events averred in this complaint are true & accurate to the best of my knowledge

Affiant D. Drumbo sr

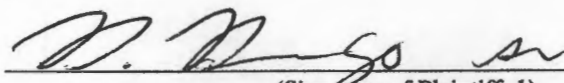
D. Drumbo sr
De-Shawn Drumbo sr
181 Paddock rd
SMYRNA, GA 30087

2.

3.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12th day of June, 2014.



(Signature of Plaintiff 1)

(Signature of Plaintiff 2)

(Signature of Plaintiff 3)

I swear under the Penalty of federal Perjury
 The foregoing is true.
 Isaiah J. Walker SGT 499268 4x12 shift


I, Isaiah J. Walker, on 5-29-14 seen
 convict Deshaun Drumgo SR coming out of the
 chawhall at the time I was being patted down
 around the waist and around my chest area which
 is normal procedure.

However, I watched SGT Kushel search
 convict Drumgo in a total different method, this
 man went up both of Drumgo's legs individually.
 And when he got up to Drumgo's right leg after the
 left leg, I could see, SGT Kushel, clutching Drumgo's
 groin area. Drumgo hollered to the top of his lungs "let
 go of my "Dick"!!!

This is sexual assault and Im reporting this!!!
 The rest of the officers laughed "Abernathy"!

Now I was locked on this SGT Kushel because he is
 known for his sexual assault and harassment and every
 body tries to go to another officer for fear of what happen
 to Drumgo.

So this is why me and other's attention is Always
 on SGT Kushel harassment & Assault.

Isaiah J. Walker 5-30-14 

I Swear Under The Penalty Of Federal
Perjury The Foregoing Is To Be True.

Date 5-29-14 (4 to 12 Shift)

I Curtis M. Lancaster 3602028 Seen Inmate De-Shawn
Drumgo Exit Out Of The Chow Hall In Building 24. At
This Time M. Drumgo Was Being Searched By SGT. Kusnel
While I Was Being Searched By Another C/O Who Was
Searching Around my Waist And Chest Area; Which Is The
Regular Search All Inmates Are Subjected To After
Leaving The Chow Hall Three Times A Day.

During The Searches I Notice SGT. Kusnel
Searching M. Drumgo In A Different Manner; By Going
Up And Down Drumgo's Right Leg, LINGERING AROUND
Where One's Private Area Is Located (i.e. Penis). The
SGT. (Kusnel) Had What Looked Like A Handful Of M.
Drumgo's Genitals, Which Made Drumgo Holler "Let Go
Of my Dick"!

M. Drumgo Outburst Caused The Other C.O.'s To
Look In His Direction. Drumgo's Natural Reaction Was To Jerk
Away To Force SGT. Kusnel To Release His Genitals. The
Other Officers Including SGT. Abenathy Laughed At The
Incident. Throughout The Prison SGT. Kusnel Is Known For
Fondling Inmates Genital Area. I'm Sure Numerous
Complaints And Grievances Have Been Put In / Filed Against
SGT. Kusnel - Knowing SGT. Kusnel M/O I AVOID OR
OBSERVE HIM CAREFULLY WHEREVER HE'S IN THE AREA OF
WHERE I'm PLACED

~~Curtis M. Lancaster~~ 5-29-14

Emergency
Grievance

FORM #584

GRIEVANCE FORMFACILITY: J.T.V.C.C.DATE: 5-29-14 turned in 5-30-14GRIEVANT'S NAME: De-Shawn Drumgo^{sr}SBI #: 365566

CASE #: _____

TIME OF INCIDENT: 4 to 12HOUSING UNIT: 23-C-U-11

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

On the Above date & time I was walking out of the Chow-Hall when SGT Kushel Grabbed my Genitalia. After seductively Grooming or Groping my leg until he reached my Genitalia in Attempts to Arouse me But only Aroused himself As I immediately jumped SGT Kushel still was Groping my Genitalia I have written A Grievance Before And it was sent to Internal Affairs Now I Demand something Be Done I will Be calling "PREGA" Because I was Just Assaulted for the second time. SGT Kushel Also Asked me to Pull my Pant's Down So He could see if that was All me. I'm not the only one who has filed Complaint's their's A Reason Everybody Evades this man. No more, I was humiliated for the last time

ACTION REQUESTED BY GRIEVANT: That this be investigated 2) that I not Be retaliated Against for filing A Grievance 3) That I never be Assaulted By this man Again 4) that I receive this officer's full name for Civil Action 5) that All Grievance Be reviewed About this man 6) That this retaliation, Assault, ^{sexual} harassment stop

GRIEVANT'S SIGNATURE: De-Shawn DrumgoDATE: 5-31-14

WAS AN INFORMAL RESOLUTION ACCEPTED? _____ (YES) _____ (NO)

WitnessesBrown

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____

DATE: _____

IF UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

cc: INSTITUTION FILE
GRIEVANT

April '97 REV

NAME: Robert Chapman
SBI# 348235 UNIT 17-A-L-7
JAMES T. VAUGHN CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



TO: United States District Court
for Delaware GMS unit # 18
844 N. King Street
Wilmington, Delaware
19801

Legal mail

